



Code of Conduct

1. Introduction

The "Leica" trademark stands for premium products Made in Germany. We - that is Leica Camera AG, our subsidiaries and affiliates ("**LEICA**" or "**COMPANY**") - are just as uncompromising in terms of our product quality as in terms of our ethical conduct.

All our actions are based on the laws applicable in the countries in which we operate. Consequently, all LEICA employees ("**EMPLOYEES**") must comply with the laws that apply to them.

Our Code of Conduct serves to supplement the applicable laws and to provide some guidance by explaining the ethical and legal framework for our business activities. It contains the essential principles for our conduct within the COMPANY, vis-à-vis external enterprises with which we have a business relationship, and in public. It applies to all EMPLOYEES worldwide and is supplemented by the following, in-depth policies:

- Anti-Corruption Policy
- Sponsorship and Donations Policy
- Antitrust Policy
- Business Partner Policy
- Whistleblower Policy

The Code of Conduct does not provide concrete behavioral instructions, but serves as orientation. If any legal requirement in a business situation or this Code of Conduct seems incomplete or unclear, please contact your line manager, the local management, the responsible local Compliance contact ("**LCR**") or the Compliance Office of LEICA.

EMPLOYEES are requested to obtain information about the applicable legal regulations, the Code of Conduct and the supplementary policies of LEICA, and to comply with the same. Violations harm LEICA financially, can permanently damage its reputation and are not tolerated.

The managers make sure that the Code of Conduct and the supplementary policies are communicated to the EMPLOYEES for whom they are responsible, and they ensure compliance.

The Code of Conduct and the supplementary policies are available at Confluence and may also be obtained from the Compliance Office upon demand. You will also find further information relevant in this context as well as the policies mentioned above at Confluence.

Definitions

1. "**PUBLIC OFFICIAL**": Any person working for a Governmental Authority or otherwise involved in the exercise of public powers, as well as any person considered a civil servant according to local law, including but not limited to foresters, teachers or professors at university. This definition also includes soldiers, judges, members of legislative bodies and candidates for political offices or all persons related to any political party.
2. "**CCO**": Chief Compliance Officer of Leica Camera AG.
3. "**CFO**": Chief Financial Officer of Leica Camera AG.
4. "**THIRD PARTY**": Any natural person and any association except for EMPLOYEES, and any legal person except for LEICA.
5. "**LEICA**" or "**COMPANY**": Leica Camera AG, its subsidiaries and affiliates.
6. "**LOCAL MANAGEMENT**": The members of the management of subsidiaries or affiliates of Leica Camera AG, authorized to represent the respective subsidiary or the respective affiliate.
7. "**EMPLOYEES**": All board members, managers and EMPLOYEES of the COMPANY (including interns and temporary EMPLOYEES).
8. "**ASSOCIATED PERSON**":
 - o relatives of EMPLOYEES,
 - o persons with whom EMPLOYEES live in cohabitation,
 - o foundations for which EMPLOYEES act as trustee and which include EMPLOYEES, their spouses or children as beneficiaries,
 - o enterprises controlled by EMPLOYEES or a person with whom EMPLOYEES live in cohabitation, either through a participation, by managing the enterprise, through a fiduciary relationship or in any other way.
9. "**GOVERNMENTAL AUTHORITY**": This not only includes national, state or local authorities or governments, but also:
 - o commercial enterprises that are government-owned or government-controlled (e.g. a state-owned television company, or a savings bank)
 - o government-controlled or managed corporate bodies and authorities
 - o public international organizations and political parties
10. "**BENEFIT**": Any material or immaterial benefit of any kind which is directly or indirectly offered or granted to THIRD PARTIES and/or PUBLIC OFFICIALS, or which is offered to or granted by THIRD PARTIES and/or PUBLIC OFFICIALS, including in particular gifts, items on loan, invitations to meals, events, journeys and accommodation.

2. Responsibility and supervision

EMPLOYEES are requested to comply with the applicable legal regulations, the Code of Conduct and the supplementary policies of LEICA at their own responsibility. Managers delegating tasks to their EMPLOYEES are not released from their responsibility; likewise, the managers' responsibility does not release the EMPLOYEES from their own obligations.

Managers have to ensure that within their sphere of responsibility no violations of law occur which could have been prevented with due supervision. They select their EMPLOYEES carefully, based on their personal and professional qualifications and suitability. They provide them with comprehensible instructions and make sure that compliance with the legal provisions is continuously monitored.

3. Free and unrestricted competition

LEICA is committed to free and unrestricted competition EMPLOYEES have to comply with all antitrust regulations (a partial area of competition law).

Antitrust assessments can often be difficult, especially because the rules may differ from country to country and from case to case. Unlawful practices in violation of antitrust law include, for example: Price fixing with competitors, agreements on market shares and production capacities, market sharing, sharing of customer groups, and agreements on the stipulation or control of resale prices. Any kind of concerted conduct, informal conversations or "gentlemen's agreements" with the intention or effect of restricting competition are prohibited. Please contact the Compliance Office or your LCR if you have any questions regarding specific activities or practices.

EMPLOYEES are therefore, for example, not allowed:

- to talk with competitors of LEICA about prices, production quantities, capacities, revenues, offers, profits, profit margins, costs, distribution methods or other parameters determining or influencing the competition conduct of the Company if done with the intention of achieving parallel behavior by the competitor;
- to make arrangements with a competitor of LEICA (including informal agreements) not to compete, to restrict business relationships with suppliers, to submit fictitious bids and/or to coordinate bids in the course of a tender procedure, or to allocate customer groups, markets, territories or production programs among themselves;
- to have conversations or to enter into oral "gentlemen's agreements" with regard to any conduct that has or could have antitrust law consequences;
- to influence in any way the resale price calculated by LEICA's distribution partners themselves.

With regard to further details, please refer to the **Antitrust Policy** of LEICA.

4. Fight against corruption

LEICA expects all EMPLOYEES and enterprises with which it has a business relationship that they refrain from any form of corruption. LEICA will take corresponding measures (including labor law measures) in any case of violation of this duty.

The offering or granting of inappropriate BENEFITS (active corruption) and the demanding or accepting of inappropriate BENEFITS (passive corruption) is prohibited. This general prohibition

of corruption applies both with regard to OFFICIALS and also in the relationship with other enterprises and business partners, both in Germany and abroad.

LEICA does not tolerate any case of active or passive corruption. If a violation is identified, we expect our EMPLOYEES to fully cooperate in clarifying the corruption case without undue delay, and to document it. Amongst others, there are the following possibilities to report such violation:

1.) Via the following reporting chain:

EMPLOYEE → Superior → CCO

2.) Via the whistleblowing system: LEICA EMPLOYEES may also report an incident via a phone hotline and a digital whistleblowing system (see chapter 16).

For further details regarding the prevention of corruption, please refer to the **Anti-Corruption Policy** and the **Sponsorship & Donations Policy**.

5. Conflicts of interest

EMPLOYEES are obliged to avoid any conflicts between their private or personal interests and the interests of the COMPANY. The interests of the COMPANY always prevail.

To avoid potential conflicts of interest, EMPLOYEES must separate any private interests from the interests of the COMPANY. Business decisions must not be influenced by private interests or personal relationships (whether direct or indirect or through ASSOCIATED PERSONS). Potential conflicts of interest must immediately be notified to the manager or the Compliance Office.

Without the express approval of the manager, EMPLOYEES are not allowed to use any property of the COMPANY (including but not limited to equipment, products, vehicles, office equipment, documents, data files, data storage media) for private purposes, or to use the services of other EMPLOYEES for private purposes.

EMPLOYEES intending to accept any external activity, wish to establish an own enterprise or to work as freelancers must inform their manager and obtain a prior written approval.

Even the appearance of preferential treatment in business transactions with competitors, suppliers, service providers and other enterprises with which LEICA has a business relationship can harm LEICA due to a personal association with EMPLOYEES and must therefore be avoided.

6. Fair working conditions

LEICA is committed to fair working conditions and compliance with the applicable labor and employment laws. LEICA does not tolerate any discrimination, harassment or insulting behavior:

7. Health and safety

Health and safety are indispensable components of our business activities. It is the responsibility and duty of all EMPLOYEES to observe health and safety measures, to comply with all relevant rules, regulations and work instructions, and to wear appropriate protective equipment where provided for under applicable law.

8. Environmental protection

LEICA complies with all applicable environmental laws, standards and regulations, and proactively pursues long-term approaches to environmental issues to prevent environmental damage and to continuously improve its own environmental performance.

Environmental protection and product safety are of utmost importance - not only for the reputation of the COMPANY, but also for the safety of our customers and future generations.

9. Confidentiality

Confidential Information of the COMPANY must be protected. Documents and other information on internal matters of the COMPANY are to be treated as confidential.

Confidential Information includes all non-public strategic, financial, technical and business-related information of the COMPANY and our business partners. It is also prohibited to talk with THIRD PARTIES about ongoing or future events, projects, technical details or other Confidential Information, or to otherwise provide them with access to such information.

We wish to point out to all EMPLOYEES that the duty of secrecy can also be violated by mistake and therefore recommend that all EMPLOYEES treat Confidential Information with special care, in particular in public places such as trains, buses, airplanes, etc.

Outsiders receiving Confidential Information are requested to sign a non-disclosure agreement.

10. Data protection

In the area of data protection, special statutory regulations apply to the handling of personal data. The collection, storage, dissemination and other use of personal data generally requires the approval of the data subject or a legal basis. We use technical and organizational measures to protect the personal data of EMPLOYEES, customers, business partners and other THIRD PARTIES in our possession against manipulation, loss, destruction and access by unauthorized persons.

With regard to further details please refer to the **Data Protection Policy**.

11. IT security

EMPLOYEES using IT systems have to give special regard to (IT-related) data secrecy, for example data protection and data security. All documentations and (electronic) data carriers must be stored safely (e.g. locked). This in particular applies to sensitive data on EMPLOYEES and for Confidential Information.

Computers are to be protected against unauthorized access (e.g. by regular change of password). Duplicates or copies of data may be made for operational purposes only and are to be stored safely. It is not allowed to access information which has nothing to do with one's own area of responsibility in the COMPANY. The confidentiality of mail correspondence and telecommunication must be safeguarded at all times.

With regard to further information please refer to the policies relating to IT (Information Technology) and the **Data Protection Policy**.

12. Records and reports

All business transactions must be documented in full, correctly, truthfully, and in a timely manner. In compliance with the installed procedures, the generally accepted accounting principles, appropriate accounting systems, controls and audits, all EMPLOYEES must ensure the reliability and accuracy of our accounts, records and reports. The requirement of truthful information also applies to travel costs and other expenses claims.

13. Handling COMPANY property and intellectual property rights

EMPLOYEES entrusted with COMPANY property are responsible for careful use, protection and administration of these assets, irrespective of whether these are tangible or intangible assets (including intellectual property rights). This in particular applies to intellectual property, i.e. each idea of our EMPLOYEES originating from our daily efforts to offer our customer first-class innovative solutions in uncompromising quality. These ideas can sometimes be protected by an official application with governmental authorities, for example the patent office (e.g. patents, designs, utility models). If necessary, these ideas must also be protected by strict secrecy (business secret). The duplication, publication or use of such intellectual property without the corresponding approval by the COMPANY can be a legal violation and is prohibited.

Expenditures/financing shall be undertaken with due care. We expect our EMPLOYEES to avoid any damage, unnecessary costs or other disadvantages and not to embezzle or misappropriate any COMPANY assets.

With regard to further details please refer to the **Secrecy Protection Guidelines**.

14. Respecting the intellectual property of THIRD PARTIES

We respect the intellectual property of THIRD PARTIES. Each of use of a right of THRID PARTIES requires a valid license agreement. EMPLOYEES who are in doubt regarding intellectual property have to contact the Legal Department and ask for further guidance.

15. Compliance with the import and export laws

LEICA produces its products in Germany and Portugal, but also in cooperation with THIRD PARTIES in many other countries. Therefore, LEICA is obliged to comply with a multitude of import and export laws. The import laws require an accurate declaration of all imported goods and the payment of the applicable customs duties and/or other taxes. Export laws can restrict the use, (re-)export, release or other transfer of provided goods, technologies, software and other foreign products containing the same or being associated products. For this reason, our sales, development and production departments as well as all related procedures must comply with the applicable export control regulations and trade restrictions.

EMPLOYEES who are in doubt regarding the applicable import and export laws are kindly requested to contact the export control and customs department for further guidance.

16. Report of violations

If EMPLOYEES gain knowledge of any circumstances indicating a violation of applicable statutory regulations, the Code of Conduct or the supplementary policies of LEICA, this must be reported without undue delay.

All EMPLOYEES can also report such incident via a telephone hotline and a digital whistleblowing system. All reports are examined. It is secured that only such persons from the circle of the Compliance Office, CCO, LCR and the management board are provided with access to information contained in the reports, who are required for the processing of the report and who are not affected by the report themselves. All information and documents received are treated as confidential to the legally permissible extent. Reprisals against EMPLOYEES who have made a report in good faith will not be tolerated. However, any intentional false accusation will be treated as a violation of the Code of Conduct and/or the supplementary policies.

With regard to further details please refer to the **Whistleblower Policy**.

17. Consequences of non-compliance

"Compliance" serves as collective term for the compliance with the statutory regulations, the LEICA Code of Conduct and the principles and/or policies based thereon. LEICA does not tolerate any violation of these rules and takes appropriate measures against anyone who fails to comply with this obligation. Each violation is treated as a serious matter and can - depending on the applicable law - be punished by one or more sanctions, such as an admonition, a warning, forfeiture of variable remuneration components, transfer or dismissal.

18. Further information and contacts

LEICA has established a Compliance Office to ensure and monitor the implementation of the Code of Conduct and supplementary policies; it also serves as contact for any questions.

The Compliance Office can be reached as follows: [*Compliance Office*](#)

The Compliance Office is also responsible:

- for examining possible violations, i.e. both based on a report and also on a random basis without cause;
- for developing and implementing regular training courses for updating the knowledge of the EMPLOYEES regarding this Code of Conduct and the supplementary policies;
- for updating the Code of Conduct and the supplementary policies as necessary, and informing the EMPLOYEES about all such updates; and
- for fostering an atmosphere of ethical behavior and accountability.